

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) Crim. No. 04-CR-10336-NMG
)
 JULIO CARRION SANTIAGO et al.)
)

**GOVERNMENT'S MOTION TO FILE MEMORANDUM IN EXCESS OF TWENTY PAGES
IN OPPOSITION TO MOTIONS TO SUPPRESS EVIDENCE
FILED BY DEFENDANTS JULIO SANTIAGO (1),
PEDRO ALBERTO MIRANDA (2) and EDWIN TORRES (8)**

Pursuant to Local Rule 7.1(B)(4), the United States of America, by and through its attorneys, United States Attorney Michael J. Sullivan and Assistant U. S. Attorney Denise Jefferson Casper, hereby moves to file a memorandum of facts and law that exceeds twenty (20) pages in opposition to the motions filed by Defendants Julio Santiago ("Santiago"), Edwin Torres ("Torres") and Pedro Alberto Miranda a/k/a Carlos Colon ("Miranda") to suppress certain evidence in the captioned matter. In support of this motion, the government states that the memorandum addresses the relevant facts and law as to each of the three, separate motions to suppress evidence.

WHEREFORE, the government respectfully requests that this Court allow the government leave to file its memorandum in excess of twenty pages in the captioned matter.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:


DENISE JEFFERSON CASPER
Assistant U.S. Attorney

Dated: June 6, 2005

CERTIFICATE OF SERVICE

This is to certify that I have this day served upon counsel of record in the captioned matter a copy of the foregoing document by electronic filing and depositing in the United States mail a copy of same in an envelope bearing sufficient postage for delivery.

This 6th day of June, 2005.


DENISE JEFFERSON CASPER
ASSISTANT UNITED STATES ATTORNEY